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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION**

DONALD J. TRUMP, the Forty-Fifth President
 of the United States, KELLY VICTORY,
 AUSTEN FLETCHER, AMERICAN
 CONSERVATIVE UNION, ANDRES
 BIAGGIANI, MARYSE VERONICA JEAN-
 LOIUS, NAOMI WOLF, AND FRANK
 VALENTINE, INDIVIDUALLY AND ON
 BEHALF OF THOSE SIMILARLY
 SITUATED,

Plaintiffs,

v.

YOUTUBE, LLC, and SUNDAR PICHAI,
 Defendants.

ANDREI POPOVICI (234820)
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Case No: 4:21-CV-08009-JSW

CLASS ACTION

**PLAINTIFFS' RE-NOTICE OF MOTION
 TO CONSOLIDATE**

Hearing Information:

Date: February 4, 2022
 Time: 9:00 a.m.
 Place: Submitted, or if the Court sets
 an oral argument, <https://cand-uscourts.zoomgov.com/j/1606745157?pwd=Q1FSb2lwciwS1BYUDc0L2VXekR0UT09>
 (Webinar ID 160 674 5157, Password 271988)
 Complaint Filed: October 13, 2021
 Transferred: November 4, 2021

Hon. Jeffrey S. White

RE-NOTICE OF MOTION TO CONSOLIDATE

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT on February 4, 2022, at 9:00 a.m., or as soon thereafter as the matter may be heard, in the Courtroom of the Honorable Jeffrey S. White, Courtroom 5, 2nd floor of the United States District Court, Northern District of California, located at 1301 Clay Street, Oakland, CA 94612, Plaintiffs will and hereby do move for an order consolidating the following three cases: (1) *Donald J. Trump, et al., v. YouTube, LLC, et al.*, Civ. No: 4:21-cv-08009-JSW (“*YouTube*”); (2) *Donald J. Trump, et al., v. Twitter Inc., et al.*, Civ. No: 3:21-cv-08378-JD (“*Twitter*”); (3) *Donald J. Trump, et al., v. Facebook Inc, et al.*, Civ. 4:21-cv-09044-JSW (“*Facebook*”).

According to the Clerk’s Notice dated 12/2/2021, Dkt. 126, the briefing schedule remains in effect. See docket text for Dkt. 125, Responses due by 12/15/2021, Replies due by 12/22/2021.

The Motion will be based upon this Notice; the accompanying Memorandum of Points and Authorities; the Declaration of M. Cris Armenta in Support of Plaintiffs’ Motion to Consolidate; any additional evidence or argument presented at or before the hearing on this matter; and all pleadings on file in this action and in the *Twitter* and *Facebook* actions.

Pursuant to The Hon. Jeffrey S. White’s Scheduling Notes, take notice that “[p]ending further order of the Court, all civil law and motion matters will be submitted on the papers. See General Orders 72, 73.” “If the Court determines a hearing is required, the hearing will be conducted by ZOOM or AT&T Teleconference during the Court’s normal law and motion calendar at 9:00 a.m. The Court will follow its usual procedure by posting a Notice of Tentative Ruling and/or Questions for Hearing before the hearing date.”

In accordance with Local Rule 1.5(n), counsel have met and conferred both electronically and via direct telephone contact.

Dated: December 2, 2021

Respectfully submitted,

ANDREI POPOVICI (234820)

MARIE FIALA (79676)

LAW OFFICE OF ANDREI D. POPOVICI, P.C.

By: /s/ Andrei D. Popovici
Andrei D. Popovici (234820)

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